

1 James H. Seymour SBC No. 048651  
706 Cowper Street  
2 Palo Alto, California 94301  
Telephone: (650) 323-7226  
3 Counsel for Appellant  
Jennifer M. Moore  
4  
5  
6  
7

8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA

10 In re

No. 07-03715 MMC

11 RICHARD L. HATFIELD,  
12

Appeal from USBC (N.D. Cal.)  
No. 07-30031 TEC 7

13  
14 Alleged Debtor.  
15

**NOTICE BY JENNIFER M. MOORE  
OF SUBMISSION OF MOTION IN  
BANKRUPTCY COURT REQUESTING  
BANKRUPTCY COURT TO  
ENTERTAIN MOTION FOR RELIEF  
PURSUANT TO BANKRUPTCY  
RULE 9024 (RULE 60(b), F. R. Civ. P.)**

16 JENNIFER M. MOORE,  
17

Appellant,  
18

vs.  
19

20 RICHARD L. HATFIELD,  
FIRST TRUST CORPORATION  
FBO RICHARD L. SPEES  
FIRST TRUST CORPORATION  
21 FBO J.D. ERICKSON, and  
GEORGE RNJAK,  
22

Appellees.  
23  
24  
25  
26  
27  
28

1 TO: The Honorable Maxine Mackler Chesney, United States District Judge, and to all  
2 parties and their counsel of record.

3 NOTICE IS HEREBY GIVEN that on 18 January 2008, a hearing was held on the motion  
4 by appellant Jennifer M. Moore in the bankruptcy case of *In re Alliance Financial Capital*  
5 *Holdings, Inc.*, number 07-30030 TEC 7, in the United States Bankruptcy Court for the  
6 Northern District of California, requesting that the bankruptcy court consent to hear her  
7 motion, pursuant to Bankruptcy Rule 9024, which incorporates the principal provisions  
8 of rule 60(b), F. R. Civ. P., for relief from the dismissal of the case.

9 No opposition was filed, nor was any argument in opposition presented at the  
10 hearing. Judge Carlson took the motion under submission and has not yet ruled on her  
11 motion.

12 As stated in the *Memorandum of Jennifer M. Moore re Status of Appeal and*  
13 *Changed Circumstances*, filed in this appeal from the dismissal on 19 November 2007,  
14 the motion is made pursuant to the procedure described in *Gould vs. Mutual Life Ins. Co.*  
15 *of New York*, 790 F.2d 769, 772 (9th Cir. 1986), and reiterated in *Davis vs. Yageo*, 481  
16 F.3d 661, 685 (9th Cir. 2007).

17 Respectfully submitted,

18 JAMES H. SEYMOUR

19  
20 Dated: 28 January 2008

21 /s/ James H. Seymour  
22 James H. Seymour  
23 Counsel for Appellant Jennifer M. Moore  
24  
25  
26  
27  
28